

REMARKS**1. Present Status of Patent Application**

This is a full response to the outstanding final Office Action, mailed April 28, 2003. Reconsideration and allowance of the application and presently pending claims 1, 2, 21-27, 29, and 31-36 are respectfully requested. Claim 28 has been cancelled without prejudice, waiver, or disclaimer.

2. Response to Rejections of Claims 1, 2, 21, 22, 24-27, 29, and 31-33 Under 35 U.S.C. §102(e)

Claims 1, 2, 21, 22, 24-27, 29, and 31-33 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by *Glenn* (U.S. Patent No. 6,143,981). In addition, claims 1 and 22 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by *Yagi* (U.S. Patent No. 6,201,292). For a proper rejection of a claim under 35 U.S.C. Section 102(e), the cited reference must disclose all elements/features/steps of the claim. See, e.g., *E.I. du Pont de Nemours & Co. v. Phillips Petroleum Co.*, 849 F.2d 1430, 7 USPQ2d 1129 (Fed. Cir. 1988).

a. Claim 1

As provided in independent claim 1, as amended, Applicants claim:

1. A microelectronic device package comprising:
 - a die attach pad, said pad having a bottom surface;
 - a plurality of substantially flat electrical connectors formed about a perimeter of said die attach pad, wherein said connectors are configured to couple a device to a substrate;
 - a coupling of a plurality of wires from said device package to one of said connectors;* and
 - an encapsulant surrounding a portion of said electrical connectors and a portion of said die attach pad, wherein said bottom surface of said die attach pad is substantially free of encapsulant.

(Emphasis added).

Applicants respectfully submit that independent claim 1, as amended, is allowable for at least the reason that *Glenn* does not disclose, teach, or suggest anywhere in the specification or in the

figures at least the feature of “a coupling of a plurality of wires from said device package to one of said connectors” as recited in claim 1. To illustrate, the present application states that any number of input/output regions may be coupled to any number of connectors. For example, three device input/output regions may be coupled to a single connector. Page 9, lines 6-8.

Glenn, however, is apparently limited to an electronic module whose individual contact members provide contact points for individual wires. As expressly stated in *Glenn*, [b]ond wire 58 electrically connects individual bonding pads 56a of die 56 to individual contacts 53. (Col. 9, Lines 33-36). Correspondingly, the figures in *Glenn* disclose only one wire 58 being connected to one connector 55. Therefore, *Glenn* fails to disclose all the features of claim 1.

Since anticipation requires that each and every element of the claimed invention be embodied in a single prior art device or practice, Applicants respectfully assert that *Glenn* does not anticipate independent claim 1 and request that the rejection of this claim be withdrawn. *See, e.g., Minnesota Min. & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 24 USPQ 2d 1321 (Fed. Cir. 1992).

Further, Applicants respectfully submit that independent claim 1, as amended, is allowable for at least the reason that *Yagi* does not disclose, teach, or suggest anywhere in the specification or in the figures at least the feature of “a coupling of a plurality of wires from said device package to one of said connectors” as recited in claim 1. For example, the figures in *Yagi* disclose only one wire 18 being connected to one connector. *See, e.g., FIG. 9.* For the reasons noted above, Applicants respectfully assert that *Yagi* does not anticipate independent claim 1 and request that the rejection of this claim be withdrawn.

b. Claims 2, 21-22, 24-27, 29, and 31-33

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claims 2, 21-22, 24-29, and 31-33 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 21-22, 24-29, and 31-33 contain all the features and elements of independent claim 1.

3. Response to Rejections of Claims 23, 34, and 36 Under 35 U.S.C. §103(a)

Claims 23 and 34 have been rejected under 35 U.S.C. §103(a) as being purportedly unpatentable over *Glenn*. In addition, claim 36 has been rejected under 35 U.S.C. §103(a) as being purportedly unpatentable over *Yagi*. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. § 103 as being obvious based upon prior art, the prior art must disclose, teach, or suggest, either implicitly, all elements/features/steps of the claim at issue. *See, e.g., In re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claims 23, 34, and 36 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims 23, 34, and 36 contain all the features and elements of independent claim 1.

CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1, 2, 21-27, 29, and 31-36 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,


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